

**NEW SOURCE CONSTRUCTION PERMIT
and FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**SteelCo Products, Inc.
205 Fairview Avenue
Jeffersonville, Indiana 47130**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F019-12161-00102	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a steel fabrication facility which coats metal beams and tanks.

Authorized individual:	Perry Ernstberger, President
Source Address:	205 Fairview Avenue, Jeffersonville, IN 47130
Mailing Address:	c/o Munich Welding, 211 Eastern Blvd., Jeffersonville, IN 47130
Phone Number:	(812) 285-1715
SIC Code:	3441
Source Location Status:	Clark
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, identified as EU 01, utilizing an airless spray application system, coating a maximum of 20 metal beams per hour and a maximum of 0.5 metal tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as 01;
- (b) One (1) pneumatic blast room, identified as EU 02, utilizing one (1) scrubber for particulate matter control, and exhausting to one (1) stack, identified as 02; and
- (c) Four (4) natural gas-fired space heaters, identified as #1, #2, #3 and #4, with a combined capacity of less than 10 million (MM) British thermal units (Btu) per hour.

A.3 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.4 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if failure to commence construction of the emission unit within eighteen (18) months from the date of issuance of the permit, or if during the construction of work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

All monitoring and record keeping requirements not already legally required shall be implemented upon start-up. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated upon start-up, the Permittee may extend the compliance schedule related to the equipment for ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the start-up of operation with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within 180 days from the date on which this source commences operation).

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction

will be achieved.

- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed

pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
 - (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint booth, identified as EU 01, utilizing an airless spray application system, coating a maximum of 20 metal beams per hour and a maximum of 0.5 metal tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as 01;
 - (b) One (1) pneumatic blast room, identified as EU 02, utilizing one (1) scrubber for particulate matter control, and exhausting to one (1) stack, identified as 02; and
 - (c) Four (4) natural gas-fired space heaters, identified as #1, #2, #3 and #4, with a combined capacity of less than 10 million (MM) British thermal units (Btu) per hour.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in each of the three (3) paint spray booths shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings.

- (b) The volume-weighted average VOC content shall be determined by use of the equation:

$$\text{Volume-Weighted Average} = \frac{3(\text{individual coating usage less water (gal/hr)} \times E_c)}{3(\text{coating usage less water (gal/hr)})}$$

where: E_c = pounds of VOC per gallon of coating less water for each coating

- (c) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that

evaporation is minimized.

D.1.5 FESOP Limit [326 IAC 2-8]

- (a) Pursuant to this rule, the PM-10 emissions from the paint booth (EU 01) and the pneumatic blast room (EU 02) shall not exceed 99 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit source wide PM10 emissions to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) Pursuant to this rule, the single HAP and total HAP input to the paint booth (EU 01) shall not exceed 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. This will limit source wide single HAP and total HAP emissions to less than 10 and 25 tons per year, respectively. Therefore the requirements of 326 IAC 2-7 do not apply.

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM from the paint booth (EU 01) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2, the PM from the pneumatic blast room (EU 02) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (0.065)^{0.67} = 0.66 \text{ lbs PM/hour}$$

Based on the above equation, particulate matter emissions from the pneumatic blast room (EU 02) shall be limited to 0.66 pounds per hour based on a maximum process rate of 130 pounds per hour.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAPs)

Compliance with the HAP content and usage limitations contained in Condition D.1.5(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 HAP Emissions

Compliance with Condition D.1.5(b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Particulate Matter (PM)

- (a) The dry filters for PM control shall be in operation at all times when the paint booth (EU 01) is in operation.
- (b) The scrubber for PM control shall be in operation at all times when the pneumatic blast room (EU 02) is in operation.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack (01) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) Daily visible emissions notations of the pneumatic blast room stack exhaust (02) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (e) The Permittee shall record the water level and sediment level in the hopper, at least once per shift when the pneumatic blast room is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the water level in the hopper shall be maintained at or above 3/4 and the sediment level in the hopper shall be below 3/4, or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the water level or sediment level is outside of the range for any one reading.
- (f) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits in Condition D.1.5(b) and the VOC emission limits established in Condition D.1.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC and HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total HAP usage for each month; and
 - (6) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Water level in the hopper; and
 - (B) Sediment level in the hopper.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.5(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: SteelCo Products, Inc.
Source Address: 205 Fairview Avenue, Jeffersonville, IN 47130
Mailing Address: c/o Munich Welding, 211 Eastern Blvd., Jeffersonville, IN 47130
FESOP No.: F019-12161-00102

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: SteelCo Products, Inc.
Source Address: 205 Fairview Avenue, Jeffersonville, IN 47130
Mailing Address: c/o Munich Welding, 211 Eastern Blvd., Jeffersonville, IN 47130
FESOP No.: F019-12161-00102

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
CThe Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: SteelCo Products, Inc.
 Source Address: 205 Fairview Avenue, Jeffersonville, IN 47130
 Mailing Address: c/o Munich Welding, 211 Eastern Blvd., Jeffersonville, IN 47130
 FESOP No.: F019-12161-00102
 Facility: Paint booth (EU 01)
 Parameter: worst case single HAP usage and total HAP usage
 Limit: The total combined usage of the worst case single HAP and total HAPs delivered to the applicators, including clean up solvents, shall be limited to less than 10 and 25 tons per 12 consecutive month period, respectively.

YEAR: _____

Month	Column 1a	Column 1b	Column 2a	Column 2b	Column 1a + 2a	Column 1b + 2b
	Single HAP Usage This Month	Total HAP Usage This Month	Single HAP Usage Previous 11 months	Total HAP Usage Previous 11 Months	Single HAP Usage 12 Month Total	Total HAP Usage 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

**OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: SteelCo Products, Inc.
Source Address: 205 Fairview Avenue, Jeffersonville, IN 47130
Mailing Address: c/o Munich Welding, 211 Eastern Blvd., Jeffersonville, IN 47130
FESOP No.: F019-12161-00102

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: SteelCo Products, Inc.
Source Location: 205 Fairview Avenue, Jeffersonville, IN 47130
SIC Code: 3441
County: Clark
Operation Permit No.: F019-12161-00102
Permit Reviewer: Nishat Hydari/EVP

On July 13, 2000, the Office of Air Management (OAM) had a notice published in the Evening News, Jeffersonville, Indiana, stating that SteelCo Products, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) for the construction and operation of a steel fabrication facility which coats metal beams and tanks. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On July 28, 2000, Evelyn Crooks of Environmental Compliance Source, Ltd., submitted comments on behalf of SteelCo Products, Inc. on the proposed FESOP. The summary of the comments and corresponding responses is as follows:

Comment # 1

Condition C.12

There is no emission monitoring equipment required under this permit. [Please see related comments at D.1.12(b) and D.1.11(e)]

Response # 1

There is no device used to monitor the water level and sediment level in the hopper. Thus Condition C.12 will be removed from the permit. The remaining C conditions will be re-numbered accordingly.

~~C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]~~

-
- ~~(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.~~
-
- ~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary~~

~~monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

Comment # 2

Condition C.14

The control unit for the sandblast operation does not have pressure gauge capability. IDEM has accepted and permitted similar units.

Response # 2

The scrubber for the sandblast operation does not have pressure gauge capability, thus Condition C.14 "Pressure Gauge Specifications" shall be deleted. The remaining C Section will be re-numbered accordingly.

~~C.14 Pressure Gauge Specifications~~

~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~

Comment # 3

Condition D.1.11(e)

The proposed control unit does not have pressure drop or flow rate gauges. IDEM has accepted and permitted units of the same design. Alternate monitoring requirements were previously sent to your attention. SteelCo will accept the alternate requirements but cannot accept these as written.

Response # 3

IDEM, OAM has taken into consideration that the proposed control unit in Condition D.1.11(e) does not have pressure drop or flow rate gauges. Upon, further review the IDEM, OAM has decided to replace the current compliance monitoring conditions with alternate compliance monitoring requirements as specified below. The following changes have been made to Condition D.1.11(e):

D.1.11 Monitoring

- (e) ~~The Permittee shall record the total static pressure drop and flow rate across the scrubber controlling the pneumatic blast room~~ **water level and sediment level in the hopper**, at least once per shift when the pneumatic blast room is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, **the water level in the hopper shall be maintained at or above 3/4 and the sediment level in the hopper shall be below 3/4, or a range established during the latest stack test.** ~~the pressure drop across the scrubber shall be maintained within the range of 2.0 to 6.0 inches of water and the flow rate of the scrubber shall be maintained at no less than 50 gallons per minute, or a pressure drop range and flow rate established during the latest stack test.~~ The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the ~~pressure reading or flow rate~~ **water level or sediment level** is outside of the ~~above mentioned~~ range for any one reading.

Comment # 4

Condition D.1.12(b)

As noted above, the proposed control unit design does not allow for these records to be taken. Alternate conditions have been submitted for consideration based on IDEM's acceptance of and approval for units of this design. There are not vents that can be redirected.

Response # 4

IDEM, OAM has taken into consideration that the proposed control unit design does not have pressure drop or flow rate gauges and thus does not allow for records to be taken as stated in Conditions D.1.12(b)(1)(A) and D.1.12(b)(1)(B). Upon, further review the IDEM, OAM has decided to delete the current record keeping requirements and replace them with alternative requirements. The following changes have been made to Sections D.1.12(b)(1)(A) and D.1.12(b)(1)(B).

D.1.12 Record Keeping Requirements

- (b) To document compliance with Condition D.1.11, the Permittee shall maintain the following:
- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
- (A) ~~Inlet and outlet differential static pressure;~~ **Water level in the hopper;**
and
- (B) ~~Liquid flow rate.~~ **Sediment level in the hopper.**

The vent referred to in Section D.1.12(b)(8) is the stack that is associated with the scrubber for the

pneumatic blast room (EU 02). This condition is required so that if in the future the source decides to re-direct the vent, it would have to notify IDEM, OAM. No changes have been made to the permit as a result of this comment.

Comment # 5

SteelCo also requests clarification of the effective dates for Conditions such as C.11. Since this is a construction permit and FESOP, the emission units may not be operational within 90 days of the permit issue date. Does this requirement then become effective 90 days after the units begin to operate or are we required to file quarterly reports indicating that the units are not yet in operation?

Response # 5

Condition C.11 has been revised to state that compliance monitoring is required to be implemented upon start-up. The following changes have been made to Condition C.11.

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

All monitoring and record keeping requirements not already legally required shall be implemented ~~within ninety (90) days of permit issuance~~ **upon start-up**. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated ~~within ninety (90) days~~ **upon start-up**, the Permittee may extend the compliance schedule related to the equipment for ~~an additional ninety (90) days~~ provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the ~~initial ninety (90) day compliance schedule~~ **start-up of operation** with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

Upon further review, the OAM has decided to make the following revisions to the permit:

1. As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law.

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

-
- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was ~~based on~~ continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The following revisions have been made to the Technical Support Document under the Compliance Requirements section to reflect the changes (**bolded** language has been added, the language with a line through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

2. The pneumatic blast room (EU 02) has applicable compliance monitoring conditions as specified

below:

- (a) Daily visible emissions notations of the pneumatic blast room stack exhaust (02) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall record the ~~total static pressure drop and flow rate across the scrubber controlling the pneumatic blast room~~ **water level and sediment level in the hopper**, at least once per shift when the pneumatic blast room is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, **the water level in the hopper shall be maintained at or above 3/4 and the sediment level in the hopper shall be below 3/4, or a range established during the latest stack test.** ~~the pressure drop across the scrubber shall be maintained within the range of 2.0 to 6.0 inches of water and the flow rate of the scrubber shall be maintained at no less than 50 gallons per minute, or a pressure drop range and flow rate established during the latest stack test.~~ The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the ~~pressure reading or flow rate~~ **water level or sediment level** is outside of the ~~above mentioned~~ range for any one reading.

These monitoring conditions are necessary because the scrubber for the pneumatic blast room (EU 02) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

SteelCo Products, Inc.
c/o Munich Welding
211 Eastern Blvd.
Jeffersonville, Indiana 47130

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____.
(Company Name)
4. I hereby certify that SteelCo Products, Inc., 205 Fairview Avenue, Jeffersonville, Indiana, 47130, has
constructed the steel fabrication facility which consists of one (1) paint booth, one (1) pneumatic blast room
and four (4) space heaters in conformity with the requirements and intent of the construction permit application
received by the Office of Air Management on April 11, 2000 and as permitted pursuant to **New Source Review**
and Fesop No. F-019-12161, Plant ID No. 019-00102 issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information
and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.
My Commission expires: _____

Signature

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a New Source Construction and Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: SteelCo Products, Inc.
Source Location: 205 Fairview Avenue, Jeffersonville, IN 47130
County: Clark
SIC Code: 3441
Operation Permit No.: F019-12161-00102
Permit Reviewer: Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed a FESOP application from SteelCo Products, Inc. relating to the construction and operation of a steel fabrication facility which coats metal beams and tanks.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) One (1) paint booth, identified as EU 01, utilizing an airless spray application system, coating a maximum of 20 metal beams per hour and a maximum of 0.5 metal tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as 01;
- (b) One (1) pneumatic blast room, identified as EU 02, with a maximum capacity of 130 pounds of sand per hour, utilizing one (1) scrubber for particulate matter control, and exhausting to one (1) stack, identified as 02; and
- (c) Four (4) natural gas-fired space heaters, identified as #1, #2, #3 and #4, with a combined capacity of less than 10 million (MM) British thermal units (Btu) per hour.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
01	Paint Booth	5.5	4	Unknown	Ambient
02	Pneumatic Blast Room	18	3.5	12,000 (Est.)	Ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on April 11, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1 through 6).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	100.54
PM-10	100.79
SO ₂	0.03
VOC	92.63
CO	3.68
NO _x	4.38

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	17.56
Ethyl benzene	2.08
Methanol	3.58
Methyl Isobutyl Ketone	13.31
TOTAL	36.53

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	HAPs
Paint Booth (EU 01)	1.73	1.73	0.00	92.39	0.00	0.00	9.90	20.59
Pneumatic blast room (EU 02)	0.43	0.43	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion (#1, #2, #3 and #4)	0.08	0.33	0.03	0.24	3.68	4.38	0.00	0.00
Total Emissions	2.24	2.49	0.03	92.63	3.68	4.38	9.90	20.59

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Clark County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP).

- (a) Pursuant to this rule, single HAP and total HAP emissions from the paint booth (EU 01) will be controlled by limiting the material usage of the coatings which will limit the source-wide single HAP and total HAP emissions to less than 10 and 25 tons/yr, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) Pursuant to this rule, PM10 emissions from the paint booth (EU 01) and pneumatic blast room (EU 02) will be controlled by dry filters and a scrubber, respectively, which will limit the source-wide PM10 emissions to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible Opacity Limitations)

This source is located in Jeffersonville Township, thus pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The paint booth (EU 01) is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because the source has taken a limit to control single HAP emissions to less than 10 tons per year and total HAP emissions to less than 25 tons per year.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the paint booth (EU 01) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the paint booth (EU 01) is in operation, in order to comply with this limit.

- (b) The particulate matter (PM) from the pneumatic blast room (EU 02) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (0.065)^{0.67} = 0.66 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from the pneumatic blast room (EU 02) shall be limited to 0.66 pounds per hour for a maximum process rate of 130 pounds per hour.

Compliance calculation:

$$(42.80 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 9.77 \text{ lbs PM/hr}$$

Controlled Compliance calculation:

$$(0.43 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.10 \text{ lbs PM/hr}$$

The pneumatic blast room (EU 02) will comply with the requirements of 326 IAC 6-3-2 by using a scrubber to control PM emissions.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booth (EU 01) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Pursuant to MSDS submitted by the applicant, and to the compliance calculations made (see page 3 of 6 Appendix A), the volume-weighted average VOC content from the one (1) paint booth adhesive application operation (ID MF-01) is less than 3.5 lb/gal, therefore, this facility is in compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). The volume-weighted average VOC content shall be determined by use of the equation:

$$\text{Volume-Weighted Average} = \frac{3(\text{individual coating usage less water (gal/hr)} * E_c)}{3(\text{coating usage less water (gal/hr)})}$$

where: E_c = pounds of VOC per gallon of coating less water for each coating

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The paint booth (EU 01) has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack (01) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit

These monitoring conditions are necessary because the dry filters for the paint booth (EU 01) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

2. The pneumatic blast room (EU 02) has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the pneumatic blast room stack exhaust (02) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop and flow rate across the scrubber controlling the pneumatic blast room, at least once per shift when the pneumatic blast room is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the scrubber shall be maintained within the range of 2.0 to 6.0 inches of water and the flow rate of the scrubber shall be maintained at no less than 50 gallons per minute, or a pressure drop range and flow rate established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading or flow rate is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the scrubber for the pneumatic blast room (EU 02) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The construction and operation of this steel fabrication facility which coats metal beams and tanks shall be subject to the conditions of the attached proposed **New Source Construction and Federally Enforceable State Operating Permit (FESOP) No.: F019-12161-00102.**

Appendix A: Emissions Calculations
Volume Weighted Average

Company Name: SteelCo Products, Inc.
Address City IN Zip: 205 Fairview Ave, Jeffersonville, IN 47130
CP: 019-12161
Plt ID: 019-00102
Reviewer: Nishat Hydari / EVP

Compliance Calculations

	Coating Usage (gal/hr)	VOC lb/gal of coating		lb VOC/hr
Interlac Gray Primer	6.0000	x	3.40 =	20.4000
Interlac Red Primer	6.0000	x	3.52 =	21.1200
TNEMEC 066	1.5000	x	3.04 =	4.5600
Bitumastic 300-M Epoxy A & B	1.5000	x	1.94 =	2.9100
Total	15.0000			48.9900

Volume-Weighted Average

49.0800/15.0000	=	3.27 VOC lb/gal
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Volume-Weighted Average = (individual coating usage (gal/hr)* Ec) / (coating usage (gal/hr))

where: Ec = pounds of VOC per gallon of coating less water for each coating

Appendix A: Emissions Calculations
Pneumatic Blasting

Company Name: SteelCo Products, Inc.
Address City IN Zip: 205 Fairview Ave, Jeffersonville, IN 47130
CP: 019-12161
Pit ID: 019-00102
Reviewer: Nishat Hydari / EVP

PM/PM10:	0.00095 gr/acf outlet x	12000 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr =	42.80 tons/yr (uncontrolled)
	where the scrubber control efficiency is listed at	99.00%				0.43 tons/yr (controlled)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: SteelCo Products, Inc.
Address City IN Zip: 205 Fairview Ave, Jeffersonville, IN 47130
CP: 019-12161
Plt ID: 019-00102
Reviewer: Nishat Hydari / EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.0

87.6

Facilities include four (4) space heaters

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.08	0.33	0.03	4.38	0.24	3.68

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: SteelCo Products, Inc.
Address City IN Zip: 205 Fairview Ave, Jeffersonville, IN 47130
CP#: 019-12161
Plt ID: 019-00102
Permit Reviewer: Nishat Hydari / EVP

Uncontrolled HAP emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl benzene	Weight % Methanol	Weight % Methyl Isobutyl Ketone	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)
TNEMEC 066	12.53	3.000000	0.50	21.336%	2.5290%	0.00%	16.1670%	17.56	2.08	0.00	13.31
Bitumastic 300-M Epoxy A & B	10.9	3.000000	0.50	20.00%	0.00%	5.00%	0.00%	14.32	0.00	3.58	0.00
Total State Potential Emissions								17.56	2.08	3.58	13.31

Note: Coatings are mutually exclusive

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAP emissions with material usage limitation

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl benzene	Weight % Methanol	Weight % Methyl Isobutyl Ketone	Material Usage Limitation	Xylene Emissions (ton/yr)	Ethyl benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)
TNEMEC 066	12.53	3.000000	0.50	21.336%	2.5290%	0.00%	16.1670%	56.37%	9.90	1.17	0.00	7.50
Bitumastic 300-M Epoxy A & B	10.9	3.000000	0.50	20.00%	0.00%	5.00%	0.00%	56.37%	8.07	0.00	2.02	0.00
Total State Potential Emissions									9.90	1.17	2.02	7.50

Note: Coatings are mutually exclusive

Note: At a 56.37% annual material usage limitation, single HAP emissions are limited to less than 10 tons per year, therefore, 326 IAC 2-7 does not apply.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation (%)

Appendix A: Emission Calculations

Company Name: SteelCo Products, Inc.
Address City IN Zip: 205 Fairview Ave, Jeffersonville, IN 47130
CP: 019-12161
Pit ID: 019-00102
Reviewer: Nishat Hydari / EVP

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Pneumatic Blasting	Natural Gas Combustion	TOTAL
PM	57.66	42.80	0.08	100.54
PM10	57.66	42.80	0.33	100.79
SO2	0.00	0.00	0.03	0.03
NOx	0.00	0.00	4.38	4.38
VOC	92.39	0.00	0.24	92.63
CO	0.00	0.00	3.68	3.68
total HAPs	36.53	0.00	0.00	36.53
worst case single HAP	17.56	0.00	0.00	17.56
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Pneumatic Blasting	Natural Gas Combustion	TOTAL
PM	1.73	0.43	0.08	2.24
PM10	1.73	0.43	0.33	2.49
SO2	0.00	0.00	0.03	0.03
NOx	0.00	0.00	4.38	4.38
VOC	92.39	0.00	0.24	92.63
CO	0.00	0.00	3.68	3.68
total HAPs	20.59	0.00	0.00	20.59
worst case single HAP	9.90	0.00	0.00	9.90
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: SteelCo Products, Inc.
Address City IN Zip: 205 Fairview Ave, Jeffersonville, IN 47130
CP: 019-12161
Pit ID: 019-00102
Reviewer: Nishat Hydari / EVP

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Interlac Gray Primer	12.18	27.95%	0.0%	28.0%	0.0%	56.73%	0.30000	20.000	3.40	3.40	20.43	490.22	89.47	57.66	6.00	75%
Interlac Red Primer	11.68	30.10%	0.0%	30.1%	0.0%	54.20%	0.30000	20.000	3.52	3.52	21.09	506.26	92.39	53.64	6.49	75%
TNEMEC 066	12.53	24.30%	0.0%	24.3%	0.0%	56.32%	3.00000	0.500	3.04	3.04	4.57	109.61	20.00	15.58	5.41	75%
Bitumastic 300-M Epoxy A & B	10.9	17.80%	0.0%	17.8%	0.0%	73.00%	3.00000	0.500	1.94	1.94	2.91	69.85	12.75	14.72	2.66	75%

State Potential Emissions

Add worst case coating to all solvents

21.09

506.26

92.39

57.66

Controlled Potential Emissions

Total Controlled Potential Emissions:	Control Efficiency	Controlled PM	
	PM	tons/yr	
	97.00%	1.73	

Note: Coatings are mutually exclusive

Note: Dry filters for PM control have a control efficiency of 97%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used